

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

SUBHASH PATEL, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

KONINKLIJKE PHILIPS N.V. AND  
FRANS VAN HOUTEN,

Defendants.

Case No. 1:21-cv-04606-ERK-MMH

**STIPULATION AND [PROPOSED] ORDER REGARDING  
CASE SCHEDULE, WORD LIMITS, AND SUR-REPLY**

This stipulation is entered into by and between Plaintiffs and Defendants.

WHEREAS, on December 5, 2024 the Court approved the parties' Proposed Discovery Plan and Scheduling Order (ECF No. 64) which, among other things, sets forth deadlines for the Plaintiffs' Motion for Class Certification ("Motion"), including a reply due on June 30, 2025.

WHEREAS, on February 28, 2025, Plaintiffs served their Motion papers on Defendants, and on April 29, 2025, Defendants served their opposition papers.

WHEREAS, due to travel commitments and work schedule constraints, Plaintiffs conferred with Defendants and requested (i) an extension for their reply in further support of their Motion, from June 30, 2025 to July 15, 2025, as well as (ii) an extension of the word limit for Plaintiffs' reply in further support of their Motion, from 3,500 words, as set by Local Civil Rule 7.1(c), to 5,500 words.

WHEREAS, Defendants agreed to these requests and, in light of the expansion of the word limit, asked to submit a short, 1,500 word sur-reply.

WHEREAS, to avoid unnecessarily burdening the Court, the parties have agreed to the time and word limit extensions specified above, and to the submission of a 1,500 word sur-reply.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiffs and Defendants that (1) the due date for Plaintiffs' reply in support of their Motion shall be July 15, 2025 and shall not exceed 5,500 words; and (2) Defendants may submit a sur-reply in further opposition to the Motion by August 15, 2025, and the sur-reply shall not exceed 1,500 words.

**AGREED TO AND STIPULATED TO BY:**

Dated: May 9, 2025

Respectfully submitted,

**POMERANTZ LLP**

/s/ Emma Gilmore

Jeremy A. Lieberman  
Emma Gilmore  
Villi Shteyn  
600 Third Avenue  
New York, New York 10016  
Telephone: (212) 661-1100  
Facsimile: (212) 661-8665  
jalieberman@pomlaw.com  
egilmore@pomlaw.com  
vshteyn@pomlaw.com

*Lead Counsel for Lead Plaintiffs and the  
Proposed Class*

**BRONSTEIN, GEWIRTZ &  
GROSSMAN, LLC**

Peretz Bronstein  
60 East 42nd Street, Suite 4600  
New York, New York 10165  
Telephone: (212) 697-6484  
Email: peretz@bgandg.com

*Additional Counsel for Lead Plaintiffs and the  
Proposed Class*

/s/ William B. Monahan

Sharon L. Nelles  
William B. Monahan  
Thomas C. White  
SULLIVAN & CROMWELL LLP  
125 Broad Street  
New York, New York 10004  
(212) 558-4000

*Counsel for Koninklijke Philips N.V. and  
Frans van Houten*

**SO ORDERED:**

Dated: Brooklyn, New York  
\_\_\_\_\_, 2025

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EDWARD R. KORMAN  
United States District Judge